

### REMARKS

Claims 1 and 4 have been amended to correct typographical errors. As amended, claim 4 depends from claim 3. No new matter is added.

The specification has been amended to move clearly comply with the written description requirement. The added subject matter has support in the text of the claims.

In paragraph 2 of the Office Action, claims 1-6 were rejected under 35 USC §112, first paragraph, as failing to comply with the written description requirement. Issue is taken with that position.

Initially, it is noted that the specification has been amended to add text that directly corresponds to that in the claims; see the Amendments to the Specification on page 2 of this paper.

In making the objection, the Examiner states that "There is no description of "generating signals" such as "each of said 2D objects", "next signal", "primary tile signal" as recited in claims 1 and 5. That is not correct. Please note the followings:

- "generating signals for each of said 2D objects" is shown in the Part Description portion of the specification; see page 9, line 31–page 10, line 13. The signal is stored as a text file (see page 10, line 10);
- "nest" signals are described at page 12, lines 1-11; and
- "primary tile" signals are described at page 12, lines 13-26.

It is submitted that the specification does in fact describe the claimed subject matter in a manner sufficient to one skilled in the art to show that the inventor was in possession of the claimed invention.

Accordingly, there is no proper basis for the §112, first paragraph rejection. That rejection should be reconsidered and withdrawn.

In paragraph 4 of the Action, the Examiner rejected claims 1-6 under 35 USC §112, second paragraph as being indefinite. Issue is taken with this position.

With respect to claim 1, 3 and 5, the Examiner says it is not understood what "generating signals defining each of said 2D objects" means. However, for the case of a 2D object such as the 2D object shown in Fig. 2, which is bounded by straight line segments, it is well known that a geometric definition of the object can be the coordinates of the interstices of the straight line segment bounding the object, namely  $(X_1, Y_1)$ ,  $(X_2, Y_2)$ , ..... $(X_{10}, Y_{10})$  as illustrated in Fig. 2. A

person of skill in the art would readily know how to generate a signal representative of those coordinates. The resultant signal would define the object. A person of skill in the art would know that the signal represents the object.

The same logic holds for the remaining signals in claim 1, claim 3 and claim 5.

With respect to claim 4, claim 4 has been amended to depend from claim 3, which is a system claim, obviating the objection.

Accordingly, there is now no proper basis for the §112, second paragraphs rejection. That rejection should be reconsidered and withdrawn.

In paragraph 6 of the Action, claims 1-6 were rejected under 35 USC 103(a) as unpatentable over U.S. patent No. 5,886,902 (Turrini). Issue is taken with that position.

In the Examiner's basis for the rejection, he cites a paragraph in column 2 of the Turrini patent, particularly lines 5-10. However, that text only suggests that in a vector space, the concept of distance between objects can easily be defined, and then one can minimize the distance between items, using different optimizing techniques, and gives an exemplary technique for a continuous vector space.

However, the applicant's independent claims 1, 3 and 5 are directed to a particular packing, or nesting, method and system that is not taught or suggested by Turrini. More particularly, in each of the applicant's independent claims, two objects are associated to form an object pair and then those associated object pairs are nested. Then, candidates are selected, and finally the nested pairs (of object pairs) are tiled.

This can be seen in Fig 8 wherein three nested object pairs 1-2, 3-4, 5-6, and 6-7 are shown in a tiled arrangement. None of this is taught or suggested in the Turrini reference.

Accordingly, there is no proper basis for the §103 rejection. That rejection should now be reconsidered and withdrawn.


### CONCLUSION

On the basis of the foregoing remarks, the Applicant respectfully submits that all the pending claims 1-6 are in condition for allowance. If there are any questions regarding these remarks, the Examiner is encouraged to contact the undersigned at the telephone number provided below.

No additional costs are believed to be due in connection with the filing of this paper. However, the Commissioner is hereby authorized to charge any additional fees that may be required, or credit any overpayment, to our Deposit Account No. 50-1133.

Respectfully submitted,

Date: 2/26/04



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